BADIAK & WILL, LLP Attorneys for Plaintiffs 106 Third Street Mineola, New York 11501-4404 (516) 877-2225 Our Ref.: 06-P-017-RB

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE TRAVELERS as subrogee of DORSON INC., and EDDIE BAUER, INC., THE HARTFORD INSURANCE CO., as subrogee of CROSS ISLAND TRADING CO., INC., and GREAT AMERICAN INSURANCE CO., as subrogee of DO IT BEST CORP.,



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#### Plaintiffs,

**RULE 7.1 STATEMENT** 

-against-

M/V "EASLINE TIANJIN", her engines, boilers, etc.,

-and-

KAWASAKI KISEN KAISHA, LTD., YANG MING MARINE TRANSPORT, LTD., PHOENIX INTERNATIONAL FREIGHT SERVICES, LTD., LAUFER FREIGHT LINES, LTD., and APL LOGISTICS,

#### Defendants.

PURSUANT TO RULE 7.1 OF THE FEDERAL RULES OF CIVIL PROCEDURE AND TO ENABLE JUDGES AND MAGISTRATE JUDGES OF THE COURT TO THE **EVALUATE POSSIBLE** DISQUALIFICATION OR RECUSAL, **PRIVATE** (NON-RECORD FOR A UNDERSIGNED COUNSEL OF GOVERNMENTAL) PARTY CERTIFIES THAT THE FOLLOWING ARE CORPORATE PARENTS, SUBSIDIARIES, OR AFFILIATES OF THAT PARTY WHICH ARE PUBLICLY.

#### SEE ATTACHED LISTS

DATED:

April 12, 20027

SIGNATURE OF ATTORNEY ROMAN BADIAK

#### TRAVELERS PC GROUP

Citicorp Assurance Co Citicorp Int'l Trade Indemnity First Floridian Auto & Home First Trenton Group

First Trenton Indemnity Co Gulf Insurance Group Atlantic Insurance Company Gulf Group Lloyds Gulf Insurance Company Gulf Insurance Co (UK) Ltd Gulf Underwriters Ins Co Select Insurance Company Premier Insurance Co of MA Red Oak Insurance Company TravCal Indemnity Company TravCal Secure Insurance Co Travelers Cas & Surety of Amer Travelers Insurance Co Travelers PC Pool Auto Ins Co of Hartford Charter Oak Fire Ins Co Farmington Casualty Company Phoenix Insurance Company Standard Fire Insurance Co TravCo Insurance Company Travelers Casualty & Surety Co Travelers Cas & Surety Co IL Travelers Casualty Co of CT Travelers Commercial Insurance Travelers Excess & Surp Lines Travelers Home and Marine Travelers Indemnity Co Travelers Indem Co of Amer Travelers Indem Co of CT Travelers Indem Co of IL Travelers Indem Co of MO Travelers Lloyds Ins Co Travelers Lloyds of Texas Ins Travelers Personal Security Travelers Prop Cas Ins Co Travelers Prop Cas Ins Co IL Triton Insurance Company

### ST. PAUL COMPANIES

Athena Assurance Company Discover Property and Casualty Discover Specialty Ins Co Fidelity & Guaranty Ins Co Fidelity & Guaranty Ins Undrws GeoVera Insurance Company Northbrook Prop & Cas Ins Co Pacific Select Property Ins Co St. Paul Fire & Casualty Ins St. Paul Fire & Marine Ins Co St. Paul Guardian Ins Co St. Paul Indemnity Ins Co St. Paul Insurance Company St. Paul Ins Co of IL St. Paul Insurance Co of ND St. Paul Medical Liab Ins Co St. Paul Mercury Ins Co St. Paul Property & Cas Ins Co St. Paul Surplus Lines Ins Co Seaboard Surety Company United States Fid & Guar Co USF&G Business Insurance Co USF&G Family Insurance Company USF&G Founders Ins Co USF&G Insurance Company of MS USF&G Insurance Company of WI USF&G Pacific Insurance Co USF&G Small Business Ins Co USF&G Specialty Insurance Co USF&G West Insurance Co American Continental Ins Co Discover Reinsurance Co Inner Harbor Reinsurance, Inc.

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AMB	COMPANY NAME Organizational Structure		
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02231	ITT Hartford Group Inc.	DE	
02230	MALION PIPE Inches	DE CT	100
07285	Hartford Life and Asside Mily Company	ČŤ.	100 100
06518 07325	Hartford Life Insurance Co.	CT CT CT	100
		CT MN	100
02233	Pacific Insurance Company. Co.	CT	100 100
02234 02706	Sentinel Insurance Company, Limited Nutmer Insurance Company, Ltd.	Hi	100
02229	Nutmeg Insurance Company, Ltd. Hartford Casualty Learning	HI CT	100
02235	Twin City Fire Insurance Company	IN	100 100
02232 02610		IN	100
02611	Trumbull Insurance Company Hartford Insurance Company	CT CT	100
02612	Hartford Insurance Company of Illinois Hartford Insurance Company of the Midwest Hartford Insurance Company of the Midwest	ΙĹ	100 100
02613 85765	Hartford Insurance Company of the Midwest Hartford Insurance Company of the Southeast	IN	100
	Hartford Insurance Company of the Southeast Hartford International Insurance Canada	FL Canada	100
85475	Zwolsche Algemeene M. V.	DE	100 100
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		Netherlands Netherlands	100
	Zwolsche Algemens I zenadeverzekering	Netherlands	100 100
	Zwolsche Algemeene Levensverzekering Beleggingsmaatschapii Puri Proposition BV	Netherlands	100
85361	Beleggingsmaatschapij Buizerdlaan BV London and Edinburgh Too	Netherlands Netherlands	100 100
85602 85643	Excess Insurance Co. T. J. Group, Ltd.	UK	100
85644	LOUGON AND Edinburgh Inc. O	UK UK	100
	Hartford Europe In-	UK	100 100
	Hartford International V	DE	100
02614	Thoroughbred International Ins. Co. NV. Hartford Lloyde Lee, Co.	Belgium Bermuda	100
10777	Property & County Co. (partnership)	TY	55.9 100
02187 F 01907	irst State Insurance Commis. Co. of Hartford		100
		ATT.	100
	New England Reinsurance Corporation	ČT.	100 100

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## AMERICAN FINANCIAL GROUP

Amer Empire Surplus Lines Pool American Empire Insurance Co American Empire Surplus Lines Fidelity Excess and Surplus Atlanta Casualty Pool American Premier Ins Co Atlanta Casualty Company Atlanta Specialty Insurance Co Great American Insurance Pool Agricultural Excess & Surplus Agricultural Insurance Co American Alliance Ins Co American Dynasty Surplus Lines American National Fire Ins American Spirit Insurance Co Contemporary American Ins Co Eagle American Insurance Co Eden Park Insurance Company Great American Insurance Co Great American Lloyd's Ins Great Texas County Mut Ins Co Seven Hills Insurance Co TICO Insurance Company Transport Insurance Co Infinity Insurance Pool
Infinity Insurance Company Infinity National Ins Corp Infinity Select Insurance Co Leader National Pool .... Leader National Insurance Co Leader Preferred Insurance Co Leader Specialty Insurance Co

Mid-Continent Group
Mid-Continent Casualty Co
Mid-Continent Insurance Co OK
Oklahoma Surety Company
National Interstate Ins Co
Republic Indemnity Ins Pool
Republic Indemnity Co of CA
Stonewall Insurance Company
Windsor Insurance Pool
American Deposit Ins Co
Coventry Insurance Company
Regal Insurance Company
Windsor Insurance Company